## IN THE SUPERIOR COURT OF RICHMOND COUNTY STATE OF GEORGIA

VALENCIA COLON,

Plaintiff,

V.

RICHARD ROUNDTREE, HARDIE DAVIS, WILLIAM FENNOY, DENNIS WILLIAMS, MARY DAVIS, SAMMIE SIAS, BOBBY WILLIAMS, BEN HASSAN, SEAN FRANTOM, BRANDON GARRETT, MARION WILLIAMS, JOHN CLARKE, ODIE DONALD II, MAURICE MCDOWELL, CHARLIE T. WALKER, JOHN DOES 1-5 AND ABC CORP 1-5,

Defendants.

CIVIL ACTION NO.: 2021-RCCV-00481

#### **NOTICE OF FILING NOTICE OF REMOVAL**

COME NOW Defendants pursuant to 28 U.S.C. § 1446 and notify this Court that a Notice of Removal was filed in the United States District Court for the Southern District of Georgia, Augusta Division with regard to this action. A copy of the Notice of Removal (without exhibits) is attached hereto as Exhibit A. Pursuant to 28 U.S.C. § 1446(d), further proceedings in the Superior Court of Richmond County are stayed unless and until the case is remanded.

Respectfully submitted this 20th day of September 2021.

/s/Tameka Haynes

Randolph Frails Georgia Bar No. 272729 Tameka Haynes Georgia Bar No. 453026

Attorneys for Defendants

## Frails & Wilson LLC

211 Pleasant Home Road, Suite A1 Augusta, GA 30907 Phone: 706-855-6715 Facsimile: 706-855-7631 randyfrails@frailswilsonlaw.com thaynes@frailswilsonlaw.com

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RICHARD ROUNDTREE, HARDIE DAVIS, WILLIAM FENNOY, DENNIS WILLIAMS, MARY DAVIS, SAMMIE SIAS, BOBBY WILLIAMS, BEN HASSAN, SEAN FRANTOM, BRANDON GARRETT, MARION WILLIAMS, JOHN CLARKE, ODIE DONALD II, MAURICE MCDOWELL, CHARLIE T. WALKER, JOHN DOES 1-5 AND ABC CORP 1-5, CIVIL ACTION NO.:2021-RCCV-00481

Defendants.

### **CERTIFICATE OF SERVICE**

This is to certify that I have this date served a copy of the foregoing **Notice of Filing** via PeachCourt's electronic notifications, email, or the United States Mail with adequate postage attached thereon to:

J. Wickliffe Cauthorn
The Cauthorn Firm
1984 Howell Mill Road, PO Box 20059
Atlanta, GA 30325
wick@thecauthornfrim.com

This 20th day of September 2021.

/s/Tameka Haynes

Randolph Frails Georgia Bar No. 272729 Tameka Haynes Georgia Bar No. 453026

Attorneys for Defendants

#### Frails & Wilson LLC

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